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**Sent:** 4/24/2020 3:25:42 PM  
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**Subject:** HW Combustion Issues Group Issue re: permitted carbon regeneration units  
**Attachments:** List of HW Carbon Regeneration Facilities Aug 2013.pdf; Copy of thermal miscellaneous units\_2020-04-22.xlsx

Hazardous Waste Combustion Issues Group,

Please see the time sensitive issue below from Sasha Gerhard in OLEM/ORCR. Briefly, we ask that you look at the attached lists of combustion units and let us know for your Region or State if you know of any additional carbon regeneration units beyond those highlighted. If yes, we would also like to see the applicable RCRA permit. This information will support development of guidance for PFAS treatment and disposal.

If you know of any additional carbon regeneration units, please reply to Sasha Gerhard at <[Gerhard.Sasha@epa.gov](mailto:Gerhard.Sasha@epa.gov)> by May 1. Please do not reply to all to this message.

Thanks,  
John Sager  
USEPA  
202-621-4623 telework

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Hello everyone,

I hope this email finds you all well. The reason for reaching out to you is in regard to EPA's effort to develop an interim guidance for the treatment and disposal of PFAS wastes as required by the National Defense Authorization Act. A cross-agency workgroup has been established and is working toward a first draft to be completed mid-May. One treatment method that is being researched for this interim guidance is thermal treatment, of which several treatment devices are to be included such as incinerators and cement kilns. Carbon regeneration/reactivation units are also included since these units may employ temperatures and residence times that may be effective in destroying PFAS contaminated wastes. Extensive research is being conducted along these lines for several thermal treatment types as a separate effort, so what we aim to do for this guidance is simply state what we currently know about thermal devices, and specific to my email, carbon regeneration units.

Unfortunately, the latest information we have regarding the universe of carbon regeneration units dates back to 2013 when we had asked for your help to ensure we captured all RCRA permitted units in response to a FOIA (see attached pdf). We recently ran a RCRA Info data pull for permitted, before construction and operating, T04 and X03 unit types in the attached excel file. I attempted to go through and delete the obvious containers and shredders, and highlighted in yellow the units that are also included in the 2013 table. I also highlighted in blue any that I thought could be carbon regeneration units.

My ask of you all is if you could review the excel file and confirm if there are any other carbon regeneration units beyond the yellow-highlighted units. The units do not have to be commercial facilities; they can also be captive units since we're attempting to identify all units. Also, once you identify/confirm the carbon regeneration units, could you also provide a copy or link to the RCRA permit, including the permit application? (Thank you to Mike Z. in Region 9 for sending the Evoqua, Parker, AZ permit link.) The permit information I am looking for is general in nature: the carbon regeneration unit design (i.e. multiple hearth, rotary kiln.), fuel

source, operating temperatures and residence times, associated APCD, and the industries carbon is received from.

I am also working with folks in our Office of Water, since drinking water and wastewater utilities use carbon (GAC) in their finishing process and thus, they are aware of carbon regeneration facilities that may not have RCRA permits.

If you have any information responsive to the request, can you please respond to me by **COB, May 1<sup>st</sup>?**

Thank you in advance!

Sasha Gerhard  
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